

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

In re: ANNETTE WHITE DIXON and GERALD EDWARD DIXON Chapter 13
Case No:25-50738 KMS

OBJECTION TO CONFIRMATION OF
INITIAL PLAN

Comes now David Rawlings, Standing Chapter 13 Trustee who would show the Court the following for which relief is sought. It is reasonably believed and the proof will show that the Chapter 13 petition and plan fail to comply with the following:

1. 11 U.S.C. §1325(a)(1). The plan does not comply with the provisions of Chapter 13 and with the other applicable provisions of the Bankruptcy Code **in that per proof of claim filed, the secured obligation to Hattiesburg Finance Co. should be treated under Part 3.3 of the plan rather than Part 3.2**
2. 11 U.S.C. §1325(a)(4). Creditors would receive a greater distribution under a Chapter 7 proceeding **in that per 341a testimony, the debtors owns 4 acres of land that are not apparent in the schedules.**

Because the plan and petition fail to comply with applicable provisions of the Bankruptcy Code, the case should be dismissed pursuant to 11 U.S.C. §1307 or the confirmation should be denied and the debtor given an opportunity to submit a modified plan within reasonable time.

PREMISES CONSIDERED, David Rawlings , Standing Chapter 13 Trustee prays:

1. That the Court either dismiss the Chapter 13 case pursuant to 11 U.S.C. §1307, sustain the objection, or deny confirmation and grant the debtor a reasonable time in which to submit a modified plan.
2. The Trustee hereby objects to any amended plan filed hereafter.

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3. That the Chapter 13 Trustee be granted such other and further relief to which he may be entitled.

Dated: 7/3/2025

/s/ David Rawlings

David Rawlings
Chapter 13 Trustee
P.O. Box 566
Hattiesburg, MS 39403
(601) 582-5011

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have on this day forwarded, a true and correct copy of the foregoing Objection, via the Court's ECF filing system, to: The U.S. Trustee, 501 East Court Street, Suite 6-430, Jackson, Mississippi 39201; and Thomas C. Rollins, Jr, P O Box 13767, Jackson, MS 39236.

So certified on this 3rd of July, 2025.

/s/ David Rawlings

David Rawlings